

# **EXHIBIT C**

**THIRD PARTY PRODUCTIONS IN SIMILAR INDIRECT PURCHASER ACTIONS**

Topic	CRT	LCD	SRAM	Batteries	ODD
Non-party discovery of OEMs?	Yes	Yes	Yes	Yes	Yes
Different types of third party entities served?	Yes	Yes	Yes	Yes	Yes
How many third parties served? <sup>1</sup>	53	55	90	93	74
OEMs of different sizes?	Yes	Yes	Yes	Yes	Yes
Transaction level purchase level data produced?	Yes	Yes	Yes	Yes	Yes
Transaction level sales data produced?	Yes	Yes	Yes	Yes	Yes
Cost data produced?	Yes (gross cost data)	Yes (input-by-input cost data)	Yes (input by input and gross cost data)	Yes (input by input data)	Yes (input by input data)
Any cost-shifting?	No	No	No	No	No

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<sup>1</sup> Number of subpoenas to third parties is estimated.

Topic	CRT	LCD	SRAM	Batteries	ODD
Any motions to compel?	No	One motion by defendant AUO to compel production by HP (granted in part and denied in part).	One motion to compel OEM to produce transactional level purchase and sales data and cost data (granted)	No	One motion to compel large retailer deposition testimony and information regarding procurement and sales (granted)
Highly sensitive or confidential data produced under Protective Order?	Yes	Yes	Yes	Yes	Yes